

U.S. Environmental Protection Agency
Edison, New Jersey 08837

242238



Pane

DATE: November 14, 1991
SUBJECT: Completion of Enforcement Checklists
FROM: Paula A. Cammarata, OSC
Technical Support Section
TO: Don Graham, OSC
Removal Action Section - A

On November 13, 1991, I received a copy of the Walton Farm Site Administrative Order.

Attached please find two enforcement checklists. The first is to assist you in the field to ensure all enforcement activities are being addressed. The second list is entitled Jobsite Tracking List. This form must be completed for all activities you have completed to date and those activities where a start date is required.

Please provide me with a copy of the completed jobsite tracking list and retain a copy for yourself for future activity completion.

These forms will become a requirement for all on-going removal actions in the near future.

Thank you for your cooperation.

cc: M. Pane, 2ERR-RAB-A

ENFORCEMENT CHECKLIST

- ___ Obtain Files from TSS
- ___ Perform Preliminary Assessment
- ___ Conduct Photodocumentation
- ___ Determine if CERCLA eligible
- ___ Write RSE
- ___ Obtain Attorney
- ___ Request PRP Search if necessary through TSS
- ___ Contact Civil Investigator(s)
- ___ Obtain Site Access Agreement if necessary
- ___ Coordinate on-site files
- ___ Draft AOC or Unilateral Order (check with ORC)
- ___ Develop Action Memorandum
- ___ Develop written Enforcement Strategy
 - ___ Viable PRP ___ yes ___ no
 - ___ Cost of Removal Action: \$ _____
 - ___ Notice Letter
 - ___ 104(e)
- ___ Draft Notice Letters (contact Becker/Cammarata for assistance)
- ___ Enter into PRP Negotiations
- ___ Develop Work Plan (Statement of Work)
- ___ Finalize Order
- ___ Date Order is Signed by RA
- ___ Date Order is Sent to PRP
- ___ Date Order is approved by PRP
- ___ Date PRP is to respond by for acceptance of Order
- ___ Date of Plan submittals
- ___ Date of EPA acceptance of Plans (H&S, Workplan, Sample, etc.)
- ___ Date PRP commences Removal Action activities
- ___ PRP bimonthly/monthly progress reports
- ___ Tracking dates
- ___ Date PRP completes on-site activities
- ___ Date of receipt of PRP close-out report
- ___ Date EPA approves PRP clean-up completion

IF EPA is conducting Removal:

- ___ Develop Enforcement Sampling Plan
- ___ Draft letter for Offering Split Samples to PRP(s)
- ___ Cost Recovery documentation

Note: If no viable PRP or cost of removal action activities defines that there is not a viable enforcement action (<\$200,000), then document no further enforcement activity required except input to CERCLIS (wastlan).

JOBSITE TRACKING LIST

☐ Request for EPA to conduct Preliminary Assessment
☐ Potential Site Assigned to TSS
☐ Info. Provided to Enforcement Coord. by OSC/TSS
☐ Inspection of Site by TSS
☐ TSS Report (Removal Site Evaluation)
☐ CERCLA Eligible ☐ Yes ☐ No
☐ Letter Request for Assignment of Attorney
☐ Assignment of ORC Attorney Name of Atty: _____
☐ Assignment of OSC Name of OSC: _____
☐ Technical Support Section File transferred to OSC
☐ Field Expedited Notice Letter Submitted to PRP Owner/Oper.
☐ OSC Performs Inspection of Site (Preliminary Assessment)
☐ Verbal Given: ☐ Yes ☐ NO ☐ Amount
☐ Site Access Agreement Needed ☐ Yes ☐ No
☐ Site Access Agreement Sent
☐ Site Access Agreement Signed
☐ Site Info sent to Civil Investigators
☐ Site Info sent to Criminal Investigators
☐ Request for PRP Search
☐ Coordination of on-site files
☐ TES or TAT Contractor assigned for PRP search
☐ PRP Search Initiated
☐ PRP Search Completed
☐ PRP(s): _____

☐ Notice Letters Drafted
☐ Notice Letters Sent
☐ Notice Letter Response Due Date
☐ Action Memo Signed
☐ AOC Drafted ☐ Unilateral Drafted
☐ Draft AOC/Unilateral Order provided to OSC for review
☐ AOC/Unilateral finalized and sent to NY for concurrence
☐ AOC/Unilateral signed and sent out to PRP
☐ PRP Negotiations
☐ PRP Response to Order
☐ Start of Fund-Financed Removal or ☐ Start of PRP removal
☐ Split sample letter sent
☐ Response option provided by PRP
☐ Cost Recovery ORC will commence
☐ Cost Recovery Closeout letter drafted - no viable PRP
☐ Closeout letter signed by ORC